

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:17-CV-01765 RA

JANE DOE

Plaintiff.

- against -

USDC SDNY
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ELECTRONICALLY FILED
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DATE FILED: 3-6-18

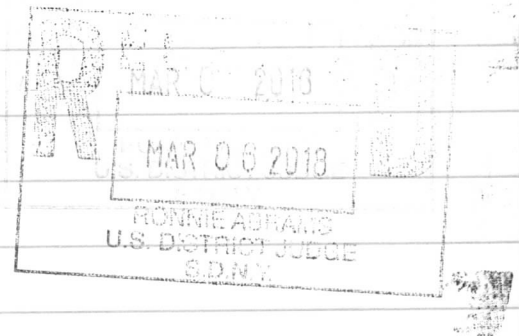
ANSWER

ANTHONY J. ANNUCCI, et al.,

JEFFREY GREEN

Defendants.

First Affirmative Defense



1. In Part II Sec. 49 of the Affidavit states a video tape showing Defendant entering Plaintiff cell. The same video tape will show that Defendant was called back to Plaintiff cell two times after alleged assault had occurred.
2. In Part II Sec. 50 of the Affidavit state an audio recording was recording when Defendant ask Plaintiff if she was ready for his blow job. That is false. The recording will reveal what actually took place inside Plaintiff cell and in the hallway outside of Plaintiff cell.

3. In Part II Sec. 56 of the Affidavit Defendant denies grabbing Plaintiff by Plaintiff arm and pushing plaintiff against the wall.
4. In Part II Sec. 57 of the Affidavit Defendant denies licking, kissing and biting Plaintiff's neck.
5. In Part II Sec. 58 of the Affidavit Defendant denies grabbing and fondling Plaintiff's breast over plaintiff's clothing.
6. In Part II Sec. 59. of the Affidavit Defendant denies overpowering Plaintiff, grabbing Plaintiff and forcibly pushing Plaintiff into the wall then pressing his body into Plaintiff's body
7. In Part II Sec. 60. of the Affidavit Defendant denies pulling up Plaintiff's Shirt and bra exposing Plaintiff's breasts.
8. In Part II Sec. 61 of the Affidavit Defendant denies Kissing, licking and biting Plaintiff's neck, breast, chest and nipples.
9. In Part II Sec. 62 of the Affidavit Defendant denies putting his hand down Plaintiff's Shorts and fondling Plaintiff's genitalia and groin.

10. In Part II Sec. 63 of the Affidavit Defendant denies any attempts to pulling down plaintiff's Shorts while trapping Plaintiff against the wall with his body.
11. In Part II Sec. 64 of the Affidavit is False Plaintiff did not push Defendant away.
12. In Part II Sec. 65 of the Affidavit is False Defendant did not hear any knocks on the Units door.
13. In Part II Sec. 67 of the Affidavit Defendant is not exiting Plaintiff's cell and rush back to the bubble. Defendant is walking at his normal pace.

Counter claim

1. Dismiss The Affidavit due to false allegations, False Statement by Plaintiff in this Affidavit. Video and Audio will revival the truth. DNA was not Obtain from Defendant because of licking or biting Plaintiff.

Ronnie Abrams United States District Judge
Court Room 1506
40 Foley Square
N.Y. N.Y. 10007

Law Office of Perlmutter & McGuinness, P.C.
Zachary Margulis - DHROMA
S/ Adam Elewa
260 Madison Avenue
Suite 1800
N.Y. N.Y. 10016

Anthony J. Annucci
Acting Commissioner of the New York Department
of Corrections and Community Supervision
Albany, N.Y.

Verification

Filing

United States District Court)
Southern District of New York) S.S.

Jeffrey Green being duly Sworn, deposes and says:

That I am the defendant. That I have read the forgoing Affidavit and know the contents thereof; that the Same is true to my own knowledge, except as to matters therein stated to alleged on information and belief; and as to those matters I believe them to be true

Jeffrey Green
Defendant

Jeffrey Green
(Print)

Sworn before me this 26th
day of February, 2018

Tanika Hunter
Notary Public

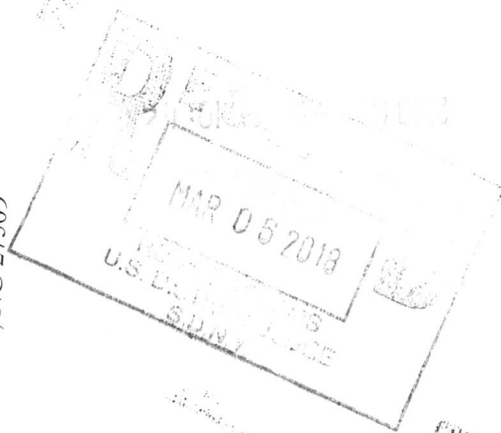


Name: Jeffrey Green Number: 78727-054
Low Security Correctional Institution
P.O. Box 900
Butner, NC 27509

PALEIGH NC 275
Research Triangle Region
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SDNY



78727-054 ↔ United States District Court
Ronnie Abrams Court Room 1506
40 Foley SQ
NEW YORK, NY 10007
United States

10007-150299

